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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 KATHLEEN SEBECK-MARQUEZ,

18 Plaintiff,

19 vs.

20 NANCY A. BERRYHILL,
21 Acting Commissioner of Social Security,

22 Defendant.

Case No. 2:16-cv-02043-GMN-GWF

JOINT STUPULATION AND
~~PROPOSED~~ ORDER FOR EXTENSION
OF TIME

23 Defendant Nancy A. Berryhill,¹ Acting Commissioner of Social Security (“Defendant”) respectfully requests that the Court extend the time for Defendant to file her Opposition to Plaintiff’s Opening Brief, due on February 16, 2017, by 30 days, through and including Monday, March 20, 2017 (the 30th day falls on a Saturday). This is the Commissioner’s first request for

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26 ¹ Nancy A. Berryhill is now the Acting Commissioner of Social Security. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Nancy A. Berryhill should be substituted for Acting Commissioner Carolyn W. Colvin as the defendant in this suit. No further action needs to be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 an extension of time to complete the merits brief; the Commissioner requested additional time
2 previously to compile the administrative record (ECF No. 17, 19).

3 An extension of time is needed in order to prepare Defendant's opposition because of the
4 drafting attorney's exceptionally heavy workload during the month of February and the week of
5 February 13th in particular, in which the drafting attorney has four district court merits briefs
6 due. This request is made in good faith with no intention to unduly delay the proceedings.
7 Counsel's office conferred with Plaintiff's counsel, who had no objection to this request, on
8 February 15, 2017.

9 Respectfully submitted this 15th day of February, 2017.

11 Respectfully submitted,

12 DANIEL G. BOGDEN
13 United States Attorney
14 District of Nevada
15 Nevada Bar No. 2137
16 BLAINE T. WELSH
17 Chief, Civil Division

18 By /s/ Urmila Taylor
19 URMILA TAYLOR
20 Special Assistant U.S. Attorney
21 Attorneys for Defendant

22 OF COUNSEL:

23 ADAM LAZAR
24 Assistant Regional Counsel, Region IX
25 Social Security Administration

26 **ORDER**

27 IT IS SO ORDERED.

28 Date: February 16, 2017

By: 
THE HONORABLE GEORGE FOLEY, JR.
UNITED STATES MAGISTRATE JUDGE

Stipulation for Extension of Time; 2:16-cv-02043-GMN-